

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : Case No. 1:22-bk-02205-HWV  
RYAN J. MORRIS :  
Debtor : Chapter 11  
RYAN J. MORRIS :  
Movant : Subchapter V  
: :  
v. : :  
: :  
FARMERS & MERCHANTS :  
BANK, ADAMS COUNTY TAX :  
CLAIM BUREAU, MOUNT JOY :  
TOWNSHIP, GETTYSBURG :  
AREA SCHOOL DISTRICT :  
Respondents :

**AFFIDAVIT**

This Affidavit is provided in support of Debtor's Motion to Approve Sale of Real Property Free and Clear of All Liens, Claims, Encumbrances and Other Interests with respect to certain property owned by the Debtor located at and known as 1685 Baltimore Pike, Gettysburg, Adams County, Pennsylvania.

Ryan J. Morris ("Morris" or "Debtor") being duly sworn hereby states as follows:

1. I am a Debtor in the United States Bankruptcy Court for the Middle District of Pennsylvania in Case No. 1:22-bk-02205. An Order granting the Motion to Convert to Chapter 11 Subchapter V was entered on June 13, 2023.
2. I filed a Plan of Reorganization (the "Plan") on September 7, 2023.
3. The Court has scheduled a Confirmation Hearing for April 9, 2024 at 11:00 a.m..

4. The Plan provides that I am permitted to sell various parcels of real property but am not required to sell any parcels of real property.

5. Included among the various parcels of real estate which I own is a parcel known as and located at 1685 Baltimore Pike, Gettysburg, Adams County, Pennsylvania (the “Real Property”).

6. On February 13, 2024, I filed a Motion for Sale Free and Clear of all Liens, Claims, Encumbrances and Other Interests (the “Sale Motion”).

7. I entered into an agreement (the Agreement”) to sell the Real Property to GSC Gettysburg, LLC (“Buyer”) for \$540,000.00. Subsequent to the entry into the Agreement, because of an issue with the sewer service to the Real Property, the Debtor and Buyer negotiated a price reduction to \$486,000.00.

8. F&M Bank, the holder of the first lien on the Real Property has consented to the reduced price

9. I own various parcels of real estate in Adams County.

10. The offer from Buyer for the Real Property was negotiated at arm’s length. The Buyer was obtained through the efforts of a commercial real estate broker, NAI/CIR. The Real Property has been listed with such broker for a period of time well in excess of a year. The Real Property has been marketed extensively.

10. The Real Property was previously the subject of two sale motions and agreements of sale. Closing did not occur under either such prior agreement.

11. I have no relationship with the Buyer other than this transaction. I am not related in any way to the Buyer. The Buyer is believed to be a good faith purchaser.

12. All lien holders and parties-in-interest have been provided with notice of the sale.

13. No objections have been filed to the Sale Motion.

The foregoing is set forth under the penalties of perjury.



Ryan J. Morris